

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- x

THE VILLAGE OF CHESTNUT RIDGE, THE	:	
VILLAGE OF MONTEBELLO, THE VILLAGE	:	
OF POMONA, THE VILLAGE OF WESLEY HILLS,	:	07-CV-9278 (KMK)
MILTON B. SHAPIRO and DR. SONYA SHAPIRO,	:	
		ECF CASE
Petitioners/Plaintiffs,	:	
- against -	:	NOTICE OF MOTION
		<u>FOR REMAND</u>
THE TOWN OF RAMAPO, THE TOWN	:	
BOARD OF THE TOWN OF RAMAPO, THE	:	
PLANNING BOARD OF THE TOWN OF	:	
RAMAPO, YESHIVA CHOFETZ CHAIM OF	:	
RADIN, SCENIC DEVELOPMENT, LLC, and THE	:	
BOARD OF APPEALS OF THE TOWN OF RAMAPO,	:	
and MOSDOS CHOFETZ CHAIM, INC.,	:	
Respondents/Defendants.	:	

----- x

PLEASE TAKE NOTICE that upon the annexed Memorandum of Law in Support of Petitioners' Motion for Remand, dated November 30, 2007, the exhibits annexed hereto, and upon all pleadings and proceedings had and filed herein, Petitioners/Plaintiffs will move this Court, before Judge Kenneth M. Karas, United States District Judge, for an Order pursuant to 28 U.S.C.A. Section 1447(c):

- (i) remanding the action back to the New York State Supreme Court, Westchester County;
- (ii) granting such other relief as this Court deems just and proper; and

(iii) in the event removal is granted, scheduling a pre-motion conference in connection with a proposed Motion for Costs and/or Sanctions pursuant to 28 U.S.C.A. Section 1447(c).

Dated: November 30, 2007
White Plains, New York

Respectfully submitted,

ZARIN & STEINMETZ

By:


Michael D. Zarin (MDZ-6692)
Daniel M. Richmond (DMR-2652)
Jody T. Cross (JTC-1433)
Attorneys for Petitioners
81 Main Street, Suite 415
White Plains, New York 10601
(914) 682-7800

TO: Terry A. Rice, Esq.
Rice & Amon
4 Executive Boulevard
Suffern, NY 10901

Patrick Sweeny, Esq.
Holland & Knight LLP
195 Broadway, 24th Floor
New York, NY 10007-3189

Dennis E. A. Lynch, Esq.
Feerick, Lynch & MacCartney PLLC
96 South Broadway
South Nyack, NY 10960

Joseph J. Haspel, Esq.
Joseph J. Haspel, PLLC
40 Mathews Street, Suite 201
Goshen, New York 10924

